

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)	Chapter 7 Proceeding
)	
PATRICIA G. ZAVALZA,)	CASE NO. 21-13296
)	
)	
Debtor.)	HON. Jacqueline P. Cox

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Tuesday, February 15, 2022, at 1:00 p.m.**, I will appear before the Honorable Jacqueline P. Cox, or any judge sitting in that judge's place, and the **Motion of the United States Trustee for an Extension of Time to Object to Discharge and to File Motion to Dismiss**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 273 2896 and the password is 778135. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Roman L. Sukley

Roman L. Sukley, Attorney
OFFICE OF THE U.S. TRUSTEE
219 South Dearborn Street, Room 873
Chicago, Illinois 60604
(312) 886-3324

CERTIFICATE OF SERVICE

I, Roman L. Sukley, an attorney, certify that I served a copy of this notice, the attached motion, and proposed order on each entity shown on the attached list at the address shown and by the method indicated on February 3, 2022.

/s/ Roman L. Sukley

SERVICE LIST

Registrants Served Through the Court's Electronic Notice for Registrants:

- R. Scott Alsterda rsalsterda@nixonpeabody.com, ralsterda@ecf.axosfs.com
- David R Herzog drhlaw@mindspring.com, dherzoglaw@gmail.com
- Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov
- Robert D McIntosh robert@markofflaw.com
- Dana N O'Brien dana.obrien@mccalla.com,
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Parties Served via First Class Mail:

Patricia G. Zavalza
6606 Kane Ave.
Hodgkins, IL 60525

BMW Bank of North America
c/o AIS Portfolio Services, LP
4515 N. Santa Fe Ave., Dept. APS
Oklahoma City, OK 73118

NuMark Credit Union
PO Box 2729
Joliet, IL 60434

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
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IN RE:) Chapter 7 Proceeding
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PATRICIA G. ZAVALZA,) CASE NO. 21-13296
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Debtor.) HON. Jacqueline P. Cox

**MOTION OF THE UNITED STATES TRUSTEE FOR AN EXTENSION OF
TIME TO OBJECT TO DISCHARGE AND TO FILE MOTION TO DISMISS**

NOW COMES PATRICK S. LAYNG, the United States Trustee for the Northern District of Illinois, by his attorney, Roman L. Sukley, and pursuant to 11 U.S.C. § 727(c)(1) and Fed. R. Bankr. P. 4004(b), hereby requests this Court to grant an extension of time to object to the discharge of Patricia G. Zavazla. (the “Debtor”), and to file a motion dismiss the Debtor’s case for abuse pursuant to 11 U.S.C. § 707(b) and Fed. R. Bankr. P. 1017(e)(1) or for cause under 707(a). In support of this request, the U.S. Trustee states as follows:

1. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A) which this Court may hear and determine under IOP 15(a) and LR40.3.1(a) of the United States District Court for the Northern District of Illinois and Local Rule 9013-9.

2. Movant is the United States Trustee for the Northern District of Illinois and brings this motion under Fed. R. Bankr. P. 2004.

3. On November 22, 2021, the Debtor filed her voluntary petition for relief Chapter 7 of the Bankruptcy Code. On or about that same time, R. Scott Alsterda was appointed Chapter 7 Trustee in the Debtor’s case (the “Chapter 7 Trustee”).

4. The last date to object to the Debtor’s discharge or to file a motion to dismiss her case under § 707 is currently set for February 14, 2022.

5. Debtor’s Schedule E/F lists a total of \$172,447.24 in nonpriority unsecured debt consisting mostly of student loan debt.

6. Debtor's Schedule I lists \$15,191.64 in monthly gross income, or \$182,299.68 in annual gross income as the Department Administrator of Rush University Medical Center. After deductions for insurance, \$921.75 for mandatory contributions for retirement plans, \$100 for parking and \$64.62 for disability Schedule I lists net monthly income of \$9,720.99.

7. The Debtor's Statement of Financial Affairs states that she earned \$142,224.76 to date of filing in 2021, \$110,971 in 2020, and \$83,696 in 2019.

8. Debtor's Schedule J lists \$9,855.65¹ in monthly expenses and lists -\$134.66 in monthly net income.

9. The Meeting of Creditors was held on December 16, 2021.

10. The U.S. Trustee requests additional time to investigate the veracity and completeness of Debtor's petition, schedules, statement of financial affairs, and testimony given at the 341 Meeting in order to determine whether cause exists to file an objection to her discharge pursuant to Section 727(a) or a motion to dismiss Debtor's case pursuant to Section 707.

WHEREFORE, the U.S. Trustee requests this Court to extend the date to object to the Debtor's discharge pursuant to 11 U.S.C. § 727(a) and for filing a motion to dismiss the Debtor's

¹ Included on Schedule J are the following monthly expenses: \$1,164 in childcare and children's education costs, \$613 in vehicle insurance, \$983.65 and \$225 in car payments and \$197 in home fence replacement.

case under § 707 through and including April 15, 2022 and for such other relief as this Court deems just.

RESPECTFULLY SUBMITTED:

PATRICK S. LAYNG
UNITED STATES TRUSTEE

DATED: February 3, 2022

By: /s/ Roman L. Sukley
Roman L. Sukley, Attorney
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219 South Dearborn Street, Room 873
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(312) 886-3324